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7 Attorney for Christian DeMarco Thomas

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 CHRISTIAN DEMARCO THOMAS,

14 Defendant.

Case No. 2:22-cr-00129-GMN-DJA

**STIPULATION FOR EXTENSION OF
TIME TO FILE OBJECTIONS TO
REPORT AND RECOMMENDATION
(ECF NO. 60)
(First Request)**

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,
19 Assistant Federal Public Defender, counsel for Christian DeMarco Thomas, that the Objections
20 to Report and Recommendation currently due on July 10, 2023, be vacated and continued to
21 August 7, 2023 and the government's response will be due August 28, 2023.

22 This Stipulation is entered into for the following reasons:

23 1. On June 26, 2023, this court issued a Report and Recommendation (ECF No.
24 60) recommending that Mr. Thomas's Motion to Suppress be denied. Defense counsel were
25 both on vacation the week that the R&R was issued. Lead counsel will return to the office for
26 a few days before taking medical leave for the remainder of July. Defense counsel requires

1 additional time to review the R&R with Mr. Thomas, file objections, and possibly attempt to
2 resolve the case short of filing any objections.

3 2. The parties agree to the continuance.

4 3. The defendant is in custody and agrees with the need for the continuance.

5 This is the first request for an extension of time.

6 DATED this 6th day of July 2023.

7
8 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

9
10 */s/ Raquel Lazo*
By _____

/s/ Bianca R. Pucci
By _____

11 RAQUEL LAZO
12 Assistant Federal Public Defender

BIANCA R. PUCCI
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHRISTIAN DEMARCO THOMAS,

7 Defendant.
8

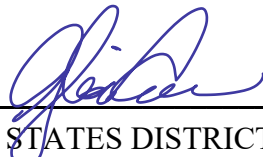
Case No. 2:22-cr-00129-GMN-DJA

ORDER

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10 Based on the stipulations and good cause appearing:

11 IT IS THEREFORE ORDERED that the Objections to Report and Recommendation
12 currently due on July 10, 2023, be continued and filed no later than August 7, 2023, and the
13 government's response to be filed no later than August 28, 2023.

14 DATED this 6 day of July 2023.

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17 UNITED STATES DISTRICT JUDGE